



Re: TSCA 📎

Dave Bartus to: Singleton, Deborah (ECY)

Cc: "Weil, Stephen"

07/25/2011 05:57 PM

No decision has been made on any EPA/TSCA response to past waste management practices, and I have not been in communication with USDOE regarding this.. To the extent that wastes regulated for disposal under TSCA will be placed in Trench 31/34 and such wastes will be stored in the immediate vicinity of either trench, my recommendation is that the re-issue establish dangerous waste permit authorization for a container storage unit adjacent to each trench. Doing so would provide authorization to storage for disposal pursuant to 40 CFR 761.65(b)(2)(iii). From a purely operational perspective (having nothing to do with TSCA), the only practical way to operate a disposal unit is to have some sort of storage area to accommodate waste deliveries prior to actual placement of the waste in the disposal unit.

While USDOE does not require a written approval from EPA for storage for disposal of PCBs originating from within the various Department sites, in the absence of a state-permitted container storage unit, any storage associated with the two trenches (or anywhere else, for that matter) would need to meet the technical standards of 40 CFR 761.65(b)(1). The two areas where PCB wastes have been historically stored do not meet these technical standards.

Hope this helps. I can call you tomorrow.

"Singleton, Deborah (ECY)"

Dave,

07/25/2011 03:43:50 PM

From: "Singleton, Deborah (ECY)" <dsin461@ECY.WA.GOV>
To: Dave Bartus/R10/USEPA/US@EPA
Cc: "Weil, Stephen" <Stephen.Weil@rl.doe.gov>
Date: 07/25/2011 03:43 PM
Subject: TSCA

Dave,

What further action is needed from you to address or have closure on the TSCA issue identified in the LLBG 31/34 Permit. Have you been in communication with USDOE regarding this? If so, what decisions were made. I understand this has been a long standing issue which had hoped to be resolved by the end of this fiscal year. Please give me a call

Deborah

Deborah Singleton

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